

From: Anderson-Carnahan, Linda
Sent time: 08/19/2014 06:53:15 AM
To: Reichgott, Christine; Szerlog, Michael
Subject: FW: supplementing the Juneau Access Project
Attachments: SEACC to EPA&COE on Juneau Access 8_18_14.pdf

It doesn't appear that this correspondence is being controlled for a response at this point.

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From: McLerran, Dennis
Sent: Monday, August 18, 2014 5:27 PM
To: Allnutt, David; Anderson-Carnahan, Linda; Soderlund, Dianne
Subject: FW: supplementing the Juneau Access Project

FYI

Dennis

From: Buck Lindekugel [<mailto:buck@seacc.org>]
Sent: Monday, August 18, 2014 5:03 PM
To: McLerran, Dennis; christopher.d.lestochi@usace.army.mil
Cc: sandra.garcia-aline@dot.gov; jon.kurland@noaa.gov; Michael Johnson; Chuck Kleeschulte; Malena Marvin; Emily Ferry
Subject: supplementing the Juneau Access Project

Howdy Sirs! Please accept the attached letter from the Southeast Alaska Conservation Council on the Juneau Access Project. We appreciate the proactive approach taken by both your agencies during this process. Please let us know if you have any trouble with any of the links.

--

Buck Lindekugel
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August 18, 2014

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Re: Juneau Access Project

Dear Sirs:

The release of the supplemental draft environmental impact statement (SDEIS) on the Juneau Access Project is imminent. We appreciate the proactive approach taken by both agencies on this supplemental planning process. The expertise both of your agencies bring to the table will help ensure selection of the least environmentally damaging practicable alternative for this project.

The Alaska Department of Transportation's (ADOT) preferred alternative for the Juneau Access Project calls for the construction of a 48-mile road along the East Lynn Canal route through the Berners Bay legislated Land Use Designation (LUD) II wildland. The proposed road would cross 36 avalanche chutes and over 100 identified geologic hazards before dead-ending at a new ferry terminal on the uninhabited Katzehin River delta across Lynn Canal from Haines, Alaska, around 1,000 miles from Anchorage. The nearly \$700 million road extension is intended to replace existing community-to-community ferry service along the north end of Alaska's Inside Passage with a road-ferry hybrid. The proposed project is undeniably more dangerous and environmentally damaging, has little freight or economic benefits, and runs counter to the goals set forth in the recent MAP-21 legislation. The East Lynn Canal alternative is staunchly opposed by the Auk Kwan, the original settlers of Juneau, because such a road would desecrate their ancestral lands.

Earlier this year, Col. Lestochi informed Governor Parnell that an extension of the project's 404 permit was not in the public interest following the federal district court's finding that the supporting NEPA analysis was inadequate. Both the Army Corps and EPA also reviewed the Preliminary SDEIS and advised ADOT and the Federal Highways Administration of the need to reassess the practicability of Alternative 3, the West Lynn Canal Alternative, because of last year's delisting of the Eastern Distinct Population Segment of Stellar sea lions.

Your staffs have properly focused the attention of ADOT and the Federal Highways Administration on updating the project's practicability analysis under the Clean Water Act's Section 404(b)(1) Guidelines. Your actions also serve NEPA's "action-forcing" purpose by ensuring that important effects and practicable alternatives will not be overlooked and that relevant information will be made available to both decisionmakers and the public during the NEPA process. We encourage both agencies to carefully consider whether the traffic forecast modeling disclosed in the upcoming SDEIS uses reasonable and realistic assumptions about frequency cost delay, ferry travel time, and the elasticity equation when comparing proposed surface transportation alternatives.

Clearly an "all ferry" alternative is less costly, safer, more culturally sensitive, and less environmentally damaging than those that call for new road or ferry terminal construction. [The Alaska DOT predicts](#) that planned improvements to the Alaska Marine Highway System from building two new Alaska Class Day Boat Ferries will significantly reduce the fuel and labor costs associated with ferry operations, as well as meet 95% of the demand in the Lynn Canal corridor. While DOT is treating both of these to-be-built ferries as "existing assets," ostensibly to lower the cost of the Katzehin road-ferry alternative, the new ferries can also operate between the existing ferry terminals in Auke Bay (Juneau), Haines, and Skagway. Consequently, these new day boat ferries will make this less environmentally damaging "all ferry" alternative even more practicable.

As this NEPA process proceeds, we are counting on both the EPA and Corps to assure that a fair and balanced assessment is made of all project alternatives. Thank you for your careful attention to this letter.

Best Regards,



Malena Marvin
Executive Director

CC (via email):

Sandra Garcia-Aline, FHA's Alaska Division
Jon Kurland, Protected Resources Division for NMFS, Alaska
Sen. Begich
Sen. Murkowski